

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

February 13, 2023

VIA ECF

The Honorable Analisa Torres
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312
Courtroom: 15D

Re: *In re Application of Forensic News LLC & Scott Stedman for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in a Foreign Proceeding*, No. 1-22-mc-347

Dear Judge Torres:

We write on behalf of Petitioners Forensic News LLC and Scott Stedman in the above-captioned matter in connection with Walter Soriano's Motion to Intervene and, in the Alternative, to Stay (the "Stay Motion") (Dkt. 15). We respectfully seek the Court's leave to file the attached Supplemental Declaration of Patrick Doris (and one accompanying exhibit) to respond to a request Soriano made for the first time in his reply brief in support of his Stay Motion, filed on Friday, February 10, 2023 (Dkt. 21). Namely, Soriano previously asked this Court to stay proceedings pending resolution of his Anti-Suit Application in the English High Court of Justice, King's Bench Division (the "High Court"). That Anti-Suit Application was resolved against him, as we informed the Court on Friday, mooted his request for a stay. *See* Dkt. 20. Now, for the first time on reply, Soriano asks for a stay pending his *appeal* of the High Court's decision, but omits key facts from his request. Petitioners thus seek leave to file the Supplemental Declaration of Mr. Doris, which provides the Court with relevant information on the procedural rules of appeal in the United Kingdom.

As always, we thank the Court for its consideration.

Respectfully submitted,

/s/ Anne Champion

Anne Champion

cc: All attorneys of record
Encl.